



MEMO

Michael Gouveia, Product Development Manager - Golden Temple & Yogi Tea
2545 Prairie Road, Eugene, OR 97402 • Phone 541-461-2160 ext 285 • Fax 541-461-1633
MichaelGouveia@kiit.com

TO: The NOSB and Arthur Neal, Director, Program Administration,
National Organic Program, USDA-AMS-TMO-NOP, 1400 Independence
Ave., SW, Room 4008, So., Ag Stop 0268, Washington, DC 20250

**SUBJECT: Docket TM-04-07 – Response Supporting Continued
Use of Materials on the National List (NOP) 8/16/2005**

The Golden Temple and Yogi Tea companies produce 153 organic products (5 are certified 100% Organic, 83 are Certified Organic and 65 are certified "Made with Organic Ingredients"). During our last fiscal year (July 2004 – June 2005) consumer purchases of our products throughout North America, enabled us to purchase, process, package and sell more than 11 million pounds (5500 tons) of certified organic raw material ingredients at a wholesale value of more than \$7.5 million.

On a global scale, since the late 1980's, the Yogi Tea company has been a pioneer in developing purchase contracts for the production and certification of organic herbs and spices where no supplies previously existed. We have since become a leader in North American and European sales of herbal teas in the natural foods marketplace, competing successfully against manufacturers of nonorganic herbal teas who also dominate the grocery mass market. The same is true for the rise of our granola and Peace Cereal products, which consumers consistently prefer for quality and flavor, and for their certified organic status. The materials we are advocating for continued use in organic processing are benign to the consumer and to the environment, and have been instrumental in enabling us to design organic products for the average consumer that compete successfully against comparable mass market, conventional grocery products.

Incorporating these various ingredients allowed on the National List, including natural flavors, has enabled us to produce organically certified products with flavor and texture profiles that have become extremely popular with consumers. We conduct intensive consumer test panel evaluations of consumer preferences for choosing the flavor and texture profiles in our product lines. There can be no doubt that the use of such ingredients has facilitated much greater consumption of organic products in the United States.

Based on our extensive market tests and consumer testimonials, if the use of these items on the National List were curtailed, there is no doubt that there would be a significant loss in consumer sales of organically certified products such as ours. This loss of business to us would then cascade into significant negative effects on our suppliers of organic ingredients, thereby resulting in a significant harm for the economic viability of organic agriculture.

For these reasons we solicit your continued support on the regulatory side, to allow us to continue the extremely challenging entrepreneurial effort to build a viable and profitable venue for the production and consumption of organic agricultural products within the United States.

Sincerely,

 08/16/05

Michael Gouveia, Product Development Manager

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

August 16, 2005

Email: National.List@usda.gov

Fax: (202) 205-7808


Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. The Golden Temple and Yogi Tea companies (certified organic by QAI, Inc.) support the continued allowance of the following substance(s):

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Natural Flavors	205.605 (a)	Does no harm. Consumer demand results in vastly increased reliance on organic agriculture.	Consumer focus group responses in product development & review.
Citric Acid	205.605 (a)	Benign & does no harm. A simple flavor enhancer that brings our products onto competitive footing with conventional herbal teas that dominate the marketplace.	Consumer focus group responses in product development & review.
Colors	205.605 (a)	Does no harm. Consumer demand for Organic extruded grain products results in vastly increased reliance on organic agriculture.	Consumer focus group responses in product development & review.

Sodium Bicarbonate	205.605 (a)	Does no harm. Consumer demand for Organic extruded grain products results in vastly increased reliance on organic agriculture.	Consumer focus group responses in product development & review.
Ascorbic Acid	205.605 (b)	Benign & does no harm. A simple flavor enhancer that brings our products onto competitive footing with conventional herbal teas that dominate the marketplace.	Consumer focus group responses in product development & review.
Glycerin	205.605 (b)	Does no harm. Glycerin / oil coating on raisins improves moisture retention in cereal products (better coating than oil alone). Dry, hard raisins are significant cause of serious tooth injuries.	Product liability experience, and history of consumer tooth injuries.
Tocopherols	205.605 (b)	Does no harm. Consumer demand results in vastly increased reliance on organic agriculture. Rosemary extract in sufficient quantities causes distortion of product flavor profile rejected by consumers.	Consumer focus group responses in product development & review.
Cornstarch (native)	205.606 (a)	Does no harm in Made with OG products. We use OG Cornstarch in Certified OG products.	Same product chemistry as organic cornstarch.
Gums	205.606 (b)	Benign, natural & does no harm. A simple agglomerating agent for powdered teabag ingredients that enhances production flow and minimizes loss of powder from teabag.	Production experience involving

Sincerely,



08/16/05

Michael Gouveia
Product Development Manager
Golden Temple and Yogi Tea Companies

Cc: Organic Trade Association
National Organic Standards Board

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

FLAVORS

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts on humans or the environment?				
1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		No		MANUFACTURE IS PROPRIETARY UNDER FDA SUPERVISION
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		No		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(iii)].		No		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		No		
5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5].		No		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		No		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		No		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		No		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		No		
Category 2. Is the substance essential for organic production?				
1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			INTENSIVE FOCUS GROUPS OF CONSUMERS VERIFY THAT MAJORITY OF ORGANIC CONSUMERS WOULD NOT PURCHASE WITHOUT THESE FLAVORS IN MANY OF OUR PRODUCTS.
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].		No		
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].		No		
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].		No		
6. Is there any alternative substances? [§ 6518 m.6].		No		
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		No		
Category 3. Is the substance compatible with organic production practices?				
1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:	YES	No		
a. copper and sulfur compounds;		No		
b. toxins derived from bacteria;		No		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		No		
d. livestock parasiticides and medicines?		No		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		No		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

CITRIC ACID

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts on humans or the environment?				
1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inert? [§ 6517c(1)(B)(ii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		
Category 2. Is the substance essential for organic production?				
1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].	NO			
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].	YES			
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].	YES			
6. Is there any alternative substances? [§ 6518 m.6].	YES			
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		NO		
Category 3. Is the substance compatible with organic production practices?				
1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(iii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasiticides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

COLORS

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
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Category 1. Adverse impacts on humans or the environment?

1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		

Category 2. Is the substance essential for organic production?

1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].		NO		
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].		NO		
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].	YES			
6. Is there any alternative substances? [§ 6518 m.6].		NO		
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		NO		

Category 3. Is the substance compatible with organic production practices?

1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasiticides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

SODIUM BICARBONATE

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
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Category 1. Adverse impacts on humans or the environment?

1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		

Category 2. Is the substance essential for organic production?

1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].		NO		
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].		NO		
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].		NO		
6. Is there any alternative substances? [§ 6518 m.6].		NO		
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		NO		

Category 3. Is the substance compatible with organic production practices?

1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(iii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasiticides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

ASCORBIC ACID

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
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Category 1. Adverse impacts on humans or the environment?

1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-eco-system? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		

Category 2. Is the substance essential for organic production?

1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].		NO		
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].	YES			
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].	YES			
6. Is there any alternative substances? [§ 6518 m.6].	YES			
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		NO		

Category 3. Is the substance compatible with organic production practices?

1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasiticides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

GLYCERIN

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
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Category 1. Adverse impacts on humans or the environment?

1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		

Category 2. Is the substance essential for organic production?

1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			COATING OF RAISINS WITH GLYCERIN & OIL IN CEREAL PRODUCTS NECESSARY TO MINIMIZE SERIOUS CONSUMER TOOTH INJURIES
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].		NO		
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].		NO		
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].		NO		
6. Is there any alternative substances? [§ 6518 m.6].		NO		
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		NO		

Category 3. Is the substance compatible with organic production practices?

1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasitocides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

TOCOPHEROLS

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
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Category 1. Adverse impacts on humans or the environment?

1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-eco-system? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		

Category 2. Is the substance essential for organic production?

1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			TOCOPHEROLS ESSENTIAL TO PRESERVE GRAIN PRODUCT FRESHNESS & EXTEND SHELF LIFE. SUFFICIENT QUANTITIES & ROSEMARY OIL DISTILL FLAVOR PROFILES
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].				
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].				
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].				
6. Is there any alternative substances? [§ 6518 m.6].				
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].				

Category 3. Is the substance compatible with organic production practices?

1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasiticides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

CORNSTARCH
(NATIVE)

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
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Category 1. Adverse impacts on humans or the environment?

1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		

Category 2. Is the substance essential for organic production?

1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			CONVENTIONAL NATIVE CORNSTARCH IS CHEMICALLY EQUIVALENT TO CERTIFIED ORGANIC CORNSTARCH, FOR USE IN MADE WITH ORGANIC PRODUCTS
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].	YES			
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].	YES			
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].	YES			
6. Is there any alternative substances? [§ 6518 m.6].	YES			
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].	YES	NO		

Category 3. Is the substance compatible with organic production practices?

1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasitocides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Evaluation Criteria for Substances Added to the National List:

8/16/2005

Submitted by Golden Temple & Yogi Tea companies

2545 Prairie Road, Eugene, Oregon 97405

fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

GUMS

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
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Category 1. Adverse impacts on humans or the environment?

1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		NO		TO THE BEST OF OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)(i)].		NO		
3. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(iii)].		NO		
4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1].		NO		
5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5].		NO		
6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5].		NO		
7. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2].		NO		
8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2].		NO		
9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)(i); § 6518 m.4].		NO		

Category 2. Is the substance essential for organic production?

1. Is the substance formulated or manufactured by a chemical process? [6502 (21)].	YES			THESE WATER EXTRACTED GUMS ARE BENIGN AND ADD SIGNIFICANT MECHANICAL PROPERTIES TO TEABAG INGREDIENTS, PACKAGING SALES OF ORGANIC HERBAL TEAS.
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)].	YES			
3. Is the substance created by naturally occurring biological processes? [6502 (21)].	YES			
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)].				
5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)].	YES			
6. Is there any alternative substances? [§ 6518 m.6].				
7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		NO		

Category 3. Is the substance compatible with organic production practices?

1. Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(iii)].	YES			
2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7].	YES			
3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		NO		

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		NO		
b. toxins derived from bacteria;		NO		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		NO		
d. livestock parasitocides and medicines?		NO		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		NO		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.